

2217-909

2/4/2014

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

February 4, 2014

Dr. James L. Kunstman
PBI/Gordon Corporation
P.O. Box 014090
Kansas City, MO 64101

Subject: Label notification to add restrictions for the state of Oregon, per PRN 98-10

Dear Dr. Kunstman:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10, dated January 29, 2014 for "Grub-No-More" EPA Registration No. 2217-909.

The Registration Division (RD) has conducted a review of the request for applicability under PRN 98-10 and finds that the changes requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please contact me directly at 703-308-8735 or email me at chao.julie@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie A. Chao".

Julie A. Chao
Insecticide-Rodenticide Branch
Registration Division (7505P)
Office of Pesticide Programs

Please read instructions on reverse before completing form.

Form Approval

Form Approval

MB No. 2070-0060. Approval Expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20460

- Registration
- Amendment
- Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 2217-909	2. EPA Product Manager Venus Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Grub-No-More	PM# Product Manager—Team 1	
5. Name and Address of Applicant (Include ZIP Code) PBI/Gordon Corporation Post Office Box 014090 Kansas City, Missouri 64101 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

NOTIFICATION

- Amendment - Explain below.
- Resubmission in response to Agency letter dated _____
- Notification - Explain below.
- Final printed labels in response to Agency letter dated _____
- "Me Too" Application.
- Other - Explain below.

FEB - 4 2014

Explanation: Use additional page(s) if necessary. (For section I and Section II.) e-mail to jkunstman@pbigordon.com FAX: 816-421-2731

Notification per Pesticide Registration Notice (PRN) 98-10: Submission of notification under PR Notice 98-10 to add a use prohibition statementy specific to the state of Oregon.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to the EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Section 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted				<input type="checkbox"/> Glass	<input checked="" type="checkbox"/> Paper
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 30 pounds		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name James L. Kunstman, Ph.D.	Title Director of Regulatory Services	Telephone No. (Include Area Code) 816-460-6292
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Director of Regulatory Services	
4. Typed Name James L. Kunstman, Ph.D.	5. Date January 29, 2014	



1217 W. 12th STREET · P.O. BOX 014090
KANSAS CITY, MISSOURI 64101-0090
816-421-4070 · 1-800-821-7925
FAX: 816-474-0462

January 29, 2014

Venus Eagle, PM Team 1
Document Processing Desk
Office of Pesticide Programs (7505P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

NOTIFICATION

FEB - 4 2014

Dear Ms. Eagle:

Subject: Labeling Notification per Pesticide Registration Notice (PRN) 98-10: Grub-No-More (EPA Reg. No. 2217-909)

- I. **Background Information:** Grub-No-More, EPA registration No. 2217-909, is a 100% repack of Albaugh, Inc., Imidacloprid 0.2G, (registration No. 42750-154).

In order to comply with Oregon State Department of Agriculture's letter of November 12, 2013, We ask to include a use prohibition statement specific to the state of Oregon. **"Do not apply this product by any application method, to linden, basswood or other *Tilia* species in the state of Oregon."** This statement is identical to the statement recently approved by the Agency (January 13, 2014) for Albaugh, Inc.'s registration 42750-154.

III. Enclosures:

- 1. Application for Pesticide Amendment (EPA Form 8570-1)
- 2. One (1) annotated version of the draft labeling
- 3. One (1) version of the draft labeling without notations and

If you have any questions, please call me at 816-460-6292 or contact me at jkunstman@pbigordon.com.

Sincerely,

James L. Kunstman, Ph.D.
Director, Regulatory Services

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Grub-No-More™

Alternate Brand Name: *Gordon's Grub-No-More Granules*

FOR OUTDOOR RESIDENTIAL USE ONLY

Not for sale, sale into, distribution and/or use in Nassau, Suffolk, Kings and Queens Counties of New York State.

ACTIVE INGREDIENT:

Imidacloprid.....	0.2%
Other Ingredients	99.8%
TOTAL.....	100.0%

Active Ingredient: 0.2% imidacloprid, CAS Registry No. 138264-41-3

KEEP OUT OF REACH OF CHILDREN

CAUTION

NET WEIGHT: 30 POUNDS

AP012914
EPA Reg. No. 2217-909
EPA Est. No. 2217-KS-1
Made in USA

MANUFACTURED BY:

An Employee-Owned Company
1217 West 12th Street
Kansas City, Missouri 64101
Telephone: 800-821-7925

NOTIFICATION

FEB - 4 2014

002217-00909.20100428
EPA Reg. No. 2217-909 *Grub-No-More*

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READ THE ENTIRE LABEL FIRST. OBSERVE ALL PRECAUTIONS AND FOLLOW DIRECTIONS CAREFULLY.

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION: Harmful if swallowed or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling.

FIRST AID

IF SWALLOWED:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
IF IN EYES:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF INHALED:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration. • Call a poison control center or doctor for further treatment advice.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for to a doctor. You may also contact 1-877-800-5556 for emergency medical information.</p> <p>Active Ingredient: 0.2% imidacloprid, CAS Registry No. 138261-41-3.</p>	
<p>Note To Physician: No specific antidote is available. Treat the patient symptomatically.</p>	

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic invertebrates. Do not apply directly to water.
Do not contaminate water when cleaning equipment or disposing of equipment washwater.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Read all directions for use and conditions of sale before using.

For residential use on lawns and landscaped areas.

Do not apply this product by any application method, to linden, basswood or other *Tilia* species in the state of Oregon.

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APPLICATION TO LAWNS:

What Gordon's Grub-No-More does:

White grubs can cause extensive damage to turf by feeding on grass roots. Affected turf turns yellow, then brown, and is easily pulled up in pieces with your hands. Mole crickets can seriously damage lawns by their tunneling activity. Some species also feed on the grass roots, as well. **Grub-No-More** prevents turf damage by killing grubs and mole crickets when they are newly hatched and before they can cause turf damage.



Grub-No-More works best when applied before grubs and mole crickets hatch. The active ingredient will remain in the root zone of the turf until the eggs of grubs or mole crickets hatch. These newly hatched insects are highly susceptible to imidacloprid, and are killed before they become large enough to cause turf damage. **Grub-No-More** also kills grubs in landscaped ornamental areas containing flowers, groundcovers, shrubs and trees.

If you have questions regarding the best time to make applications in your area, you can consult your local County University Extension Office. Be sure that you describe the product you are using when seeking such advice.

Pests Controlled:

White grubs (including the larvae of Japanese beetle, Oriental beetle, chafer, Asiatic garden beetle, May or June beetles, and black turfgrass ataenius) and mole crickets.

How to Apply:

Using either a drop-type or rotary-type spreader, apply **Grub-No-More** uniformly over the area being treated. Avoid the use of spreaders which may apply the product in narrow, concentrated or uneven bands. Calibrate your spreader according to the spreader manufacturer's directions to ensure the proper amount of **Grub-No-More** is applied. Check frequently to be sure spreader is working properly and spreading granules evenly.

After Applying:

Grub-No-More will work best if the lawn is watered thoroughly or if rainfall occurs within 24 hours after application to move the active ingredient through the thatch and down into the soil. Avoid mowing lawn until watering or rainfall has occurred so that the uniformity of the granules is not disturbed.

When to Apply:

Grub-No-More works best when applied before grubs and mole crickets hatch.

For best results, apply as follows:

White grubs: Apply once, anytime from April through mid-August.

Mole crickets: In Florida, apply once from early April through early May. Elsewhere, apply once from mid-May through mid-June.

Do not apply **Grub-No-More** when turf areas are waterlogged. The product may not work effectively under these conditions.

How Much to Apply:

For control of white grubs, **Grub-No-More** should be applied at the rate of 2.87 pounds of product per 1,000 square feet. For mole cricket control, apply 3.8 pounds of product per 1,000 square feet. **Table 1** can be used as a guide for applying the proper rate of **Grub-No-More**. However, the application rate can vary depending on the speed of application and the condition of the spreader. For best results, use a normal, steady pace when applying to obtain an accurate, even application.

Table 1. SPREADER SETTING TABLE AND APPROXIMATE TREATED AREAS		
Spreader Model	Application Rates	
	Setting to deliver 2.87 pounds of product per 1,000 sq.ft.	Setting to deliver 3.8 pounds of product per 1,000 sq.ft.
Earthway Rotary	13	15
Precision Drop	12	14
Precision Rotary	4.7	5.9
Red Devil Rotary	7	8
Sears Rotary	3	3.5
Scotts Accugreen	5.25	5.75
Scotts Edgeguard	3.25	4
Scotts Precisiongreen	4	4.5
Scotts Speedygreen	3.25	4
Scotts Tractor	3	3.5
Spyker Rotary	4.75	5.25

Settings are approximate. The condition of your spreader, the speed at which you walk and uneven terrain may affect the rate of application. Calibrate your spreader according to manufacturer's directions.

Tip: 1,000 sq.ft. = 20 ft x 50 ft

Do not use a spreader that applies granules in narrow, concentrated or uneven bands. Be sure the spreader works properly and spreads granules evenly.

For additional spreader settings, please visit our website at www.pbigordon.com/homefarm.

**APPLICATION TO LANDSCAPE PLANTINGS
(Trees, Shrubs, Evergreens, Flowers, Groundcovers)**

Pests Controlled:

White grubs (including larvae of Japanese beetle, Oriental beetle, chafers, Asiatic garden beetle, May and June beetle, and black turfgrass ataenius).

How to Apply:

Apply as a broadcast treatment to soil, mulch or other substrate. Prior to application, remove black plastic from area to be treated to allow water to penetrate into the soil. Permeable weed barriers need not be removed prior to application.

After Applying:

Grub-No-More will work best if material is worked into the soil around plants or if a thorough watering of rainfall occurs within 24 hours after application to move the product down through mulch and into the soil.

When to Apply:

The best control of grubs will be obtained if **Grub-No-More** is applied before grubs begin to hatch. For best results, application should occur from April through mid-August.

DO NOT apply to waterlogged areas. Imidacloprid may not work effectively under these conditions.

How Much to Apply:

Grub-No-More should be applied at the rate of 2.87 pounds of product per 1,000 square feet. This 30 pound bag will treat 10,000 square feet of landscaped plantings. However, the application rate can vary depending on the speed of application and the condition of the spreader.

[Optional Text--

Table 2 can be used as a guide for applying the proper rate of **Grub-No-More**

Table 2.

Bag Size	Treated Area, sq. ft.
30 Pounds	10,000 sq. ft. ft.

End Optional Text]

NOTE: DO NOT apply Grub-No-More to vegetable gardens.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal

STORAGE CONDITIONS: Store in original container in a cool, dry place, out of the reach of children, preferably a locked storage cabinet.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency or www.website.com for disposal instructions. Never place unused product down any indoor or outdoor drain

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LIMITED WARRANTY AND DISCLAIMER

FOR USE ONLY AS DIRECTED. TO THE EXENT CONSISTENT WITH APPLICABLE LAW, THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE HEREBY EXPRESSLY DISCLAIMED. IN NO CASE SHALL THE MANUFACTURER BE LIABLE FOR INCIDENTAL, CONSEQUENTIAL, OR SPECIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. If these terms are not acceptable, return this product unopened immediately to the point of purchase, and the purchase price will be refunded in full. The terms of this LIMITED WARRANTY AND DISCLAIMER cannot be varied by any written or verbal statements or agreements at the point of sale or elsewhere.

APPENDIX:

I. Advertising claims that may be presented on the container labels or promotional information supporting this product.

- Lawn and garden insecticide
- Season long grub control
- Use anytime...spring through late summer
- For residential use on lawns and landscaped areas.
- Kills white grubs and mole crickets early, before they damage your lawn.
- Apply before insects hatch to prevent turf damage.
- One application controls grubs all season long.
- One application stops grubs all season long.